

JUDSON H. HILL, ESQ.

May 24, 2019

By ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Sage Telecom Communications, LLC and Telscape Communications, Inc. d/b/a TruConnect; WC Docket Nos. 17-287, 11-42, 09-197, 18-213.

Dear Ms. Dortch:

On May 22, 2019 I, counsel to Telscape Communications, Inc. d/b/a TruConnect and Sage Telecom Communications, LLC (“TruConnect”) and Nathan Johnson, Co-CEO of TruConnect talked by telephone with Nicholas Degani, Esq. Senior Counsel to the Chairman, to discuss the FCC Order, Notice of Proposed Rulemaking and Notice of Inquiry released by the NOI telecom, and Commission on December 1, 2017¹ and Notice of Inquiry, released by the Federal Communications Commission on August 3, 2018, WC Docket No. 18-213.²

We emphasized that TruConnect shared the FCC Commissioners’ objective to root out any remaining waste, fraud and abuse in the Lifeline program to ensure that only people who are eligible will receive Lifeline services. Without this safety net service, many low-income Americans including numerous elderly citizens and veterans would incur even greater challenges finding employment, accessing healthcare and reaching emergency first responders. We shared the broad support within the Lifeline service provider community for the Commission’s work to improve the Lifeline eligibility National Verifier implementation. Before the verifier should continue to be rolled out, we again emphasized that more work is needed to avoid harming the people it was intended to serve. We recommended that the hard launch state roll-outs of the National Verifier be frozen immediately, that state waivers be permitted or even that the National Verifier revert to soft launch status to allow critical technological improvements, APIs, and data access improvements to be completed.

Currently many government services databases in many states cannot be accessed or are sometimes unreliable. Consequently, Lifeline subscriber new enrollments have dropped substantially. Reduced enrollments do not indicate that fraud has been found but actually that either certain databases are not now accessible or that the technology interface is cumbersome and does not really work yet.

The flaws in the verification system has its consequences. Eligible customers suffer when they cannot find a good or better job, or access emergency and healthcare services. In the short-term fewer enrollments may save USF dollars, however, when this safety net program fails then the federal and states’ budgets suffer the direct financial impact of higher un-employment, under-employment and a less healthy and safe citizenry.

¹ See *Bridging the Digital Divide for Low-Income Consumers et al.*, WC Docket No. 17-287 et al. Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (Nov. 16, 2017); Notice of Inquiry, released by the Federal Communications Commission WC Docket No. 18-213.

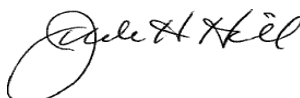
Next, we discussed the data minimum standard requirements and we expressed a concern that on December 1, 2019 the mobile broadband minimum data requirements are scheduled to rise again. If the data minimum standard requirements increase above current levels it will force ETC's to pick up the added data expense for each Lifeline subscriber because many Lifeline subscribers cannot afford to pay more for the current mandated data. They may not even all want the extra data and most definitely do not demand it. It is expected that many ETCs will exit the program if data mandates increase. This will harm many veterans and elderly who the program was intended to serve. The impact of the loss of providers will be very expensive for the federal government and state budgets. We recommended that the FCC follow free market principles and continue the data standard that exists today while allowing customers the choice to purchase more data as needed. Further, we suggested that the digital divide will widen rather than narrow if data mandates increase because Lifeline providers will drop out and customers will completely lose access to data and cell coverage.

We suggested that the FCC consider freezing the expected data escalation mandate. There should be a new determination of both the need and demand for increased data, the economics, and viable solutions to pay more it.

I concluded our conversations expressing a desire to actively and constructively participate in the Lifeline rulemaking to help the Commission achieve their stated objectives.

Pursuant to section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Judson H. Hill". The signature is stylized with a large, looping initial "J" and a distinct "H" and "Hill".

Judson H. Hill, Esq.

Judson@judsonhill.com

cc: Nicholas Degani, Esq.

² See Ex Parte filing from Counsel to Q Link Wireless, LLC, WC Docket No. 17-287, WC Docket No. 11-42 and WC Docket No. 09-197 filed May 25, 2018 and supplemented May 31, 2018.